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October 7, 2022

VIA ECF

The Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 324 North | Chambers: 317 North

Re: Joint Status Report for *Valladares et al v. Crosscity Inspection Services, Inc. et al*
Civil Action No. 1:21-cv-04511-AMD-TAM

Dear Judge Merkl:

We represent Defendants Crosscity Inspection Services, Inc., Huge Construction LLC, Meiqiao LLC, and Weihong Hu, as an individual (collectively “Defendants”), in the above-referenced matter. Pursuant to Your Honor’s Order on September 29, 2022, we write jointly with Plaintiffs’ counsel to respectfully propose an updated discovery schedule as follows:

1. End of fact discovery: February 28, 2023;
2. Status update to Your Honor regarding discovery: February 21, 2023;
3. Deadline to file a joint status report on ECF certifying the close of all discovery: March 7, 2023; and
4. Deadline to initiate any dispositive motions: April 4, 2023.

We thank Your Honor for your time and consideration.

Respectfully,

/s/ Joshua Zuckerberg
Joshua Zuckerberg